

CORNHUSKER MOTOR LINES

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Federal Highway Administration
Office of Chief Council
HCC-10
Room 4232
400 Seventh Street S.W.
Washington D.C. 20590

RE: FHWA Docket # MC96-18

To whom it may concern:

In reference to the questions on the Safety Rating Proposal:

1) **How should non-rated carriers be categorized?**

If a carrier has never had a rating and it has not effected their business, it makes sense that none is needed. If all of a sudden it becomes an issue (due to pressure from shippers) the carrier could maybe ask and receive from the regional FHWA a letter of temporary status of satisfactory which would remain in effect until the company is audited.

2) **How should carriers be selected for audits?**

Audits after a carrier has rating should be by a performance based formula with factors such as accidents as defined by 390.5 (where ticketed), or out-of-service violations of either equipment 396.9 or drivers 395.13.

3) **Whether there is a relationship between hours of service violations and accident rates?**

Yes, we have experienced a direct relationship as pressure has been put on drivers to reduce hours of service violations. Over the last several years, the number of accidents has escalated slightly. The internal pressure a driver experiences to work with the dispatcher to keep the customer happy and to get home on a regular basis is adversely effected by present hours of service rules.

4) **What weight should be given to various safety-related factors (i.e. accidents vs. hours of service)**

The heavily weighted categories should be chargeable accidents (preventable / ticketed) out of service orders for faulty equipment, haz-mat violations, and flagrant falsification of logs with no visible evidence of trying to correct and solve the reasons.

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